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BERLIN  
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JEROME C. MUYS, JR.  
ATTORNEY-AT-LAW

DIRECT DIAL  
(202)424-7547

CONFIRMATION OF FAX

April 23, 1993

VIA TELECOPY

Thomas Mintz, Esq.  
United States Environmental  
Protection Agency, Region IX  
Office of Regional Counsel  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Re: Pacific Airmotive Corporation

Dear Mr. Mintz:

We are counsel to Pacific Airmotive Corporation ("PAC"). I am writing in response to the letter we recently received from David B. Jones, Chief, Remedial Action Branch regarding the soil gas investigation proposed for the PAC facility in Burbank. The letter, which was directed to Mr. Downs of this office, requested that we respond to EPA's request within one week. (The letter is undated, but was received by us on April 19, 1993.) You were identified as the attorney contact in the letter.

PAC has a number of questions and concerns about Mr. Jones' letter which I would like to discuss with you before responding formally to the letter. I attempted to reach you this morning and was advised that you will be out of the office for the next several weeks. I also attempted to contact your supervisor but was unable to reach her.

Please call me at your earliest convenience.

Sincerely,

*Jerome C. Muys, Jr.*

Jerome C. Muys, Jr.

cc: Mr. David B. Jones  
Ms. Colette Kostelec  
Mr. Tony DiVincenzo  
Mr. Robert Ghirelli  
(all by telecopy)

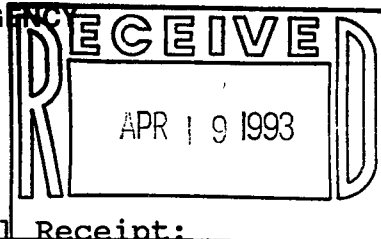
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901



Certified Mail Receipt:

P 424 453 346

Mr. Thomas Downs, Esq.  
Swidler & Berlin, Chartered  
3000 K Street, N.W., Suite 300  
Washington, D.C. 20007

Dear Mr. Downs:

As you know, the U.S. Environmental Protection Agency (EPA) is conducting an investigation of the sources of groundwater contamination in the Burbank area. EPA is working with the California State Regional Water Quality Control Board (RWQCB), which has the lead in overseeing investigations at individual facilities.

Considering the nature and length of operations of Pacific Airmotive Corporation (PAC) in the Burbank area and the results of recent groundwater monitoring, EPA believes the PAC facility to be a high priority for characterization and cleanup. However, the work to be conducted by PAC under RWQCB oversight can not proceed until a workplan is developed that meets the standard requirements of the RWQCB Well Investigation Program.

After examining the record, it appears that PAC has not complied with repeated RWQCB requests for a workplan for conducting a soil gas investigation at the PAC facility at 2940 N. Hollywood Way in Burbank.

We strongly advise PAC to work with RWQCB to develop the required workplan immediately. Otherwise, EPA will consider using its federal enforcement authority under the Comprehensive Environmental Response, Compensation and Liability Act to require that this work be done.

We expect PAC to be in contact with either RWQCB or EPA within the next week to discuss how PAC intends to comply with RWQCB. Please direct questions to the EPA attorney for this project, Mr. Thomas Mintz at (415) 744-1333 or the EPA Project Manager, Colette Kostelec at (415) 744-2253. Also, please provide Colette Kostelec a courtesy copy of future correspondence with RWQCB.

Sincerely,

David B. Jones, Chief  
Remedial Action Branch

cc: Tony Divincenzo - Pacific Airmotive Corporation  
Robert Ghirelli, Executive Officer RWQCB